

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF TEXAS
 FORT WORTH DIVISION

UNITED STATES OF AMERICA

NO. 4:23-CR-00127-P

v.

CHRISTOPHER KIRCHNER

GOVERNMENT'S WITNESS LIST

The United States of America, by and through the undersigned Assistant United States Attorneys, files the government's witness list.

<u>No.</u>	<u>Name</u>	<u>Subject Matter of Testimony</u>	<u>Likelihood of Being Called</u>	<u>Sworn</u>	<u>Testified</u>
1.	James Atwell	This witness may testify to his investments in Slync and his role as a member of Slync's Board of Directors, including his interactions and communications with the defendant.	Possible		
2.	Jim Batjer	This witness may testify to his personal and business dealings with the defendant, including his investment into Slync's purported "Series C" fundraising round.	Possible		
3.	Michael Bevill	This witness may testify to his personal and business dealings with the defendant, including his investment into Slync's purported "Series C" fundraising round.	Probable		
4.	Paul Bischler	This witness may testify to his personal and business dealings with the defendant, including his investment into Slync's purported "Series C" fundraising round.	Possible		
5.	David Blumberg	This witness may testify about his venture capitalist firm leading the	Probable		

<u>No.</u>	<u>Name</u>	<u>Subject Matter of Testimony</u>	<u>Likelihood of Being Called</u>	<u>Sworn</u>	<u>Testified</u>
	(Founder & Managing Partner of Blumberg Capital)	Series A fundraising round of Slynco and his role as a member of Slynco's Board of Directors, including his interactions and communications with the defendant.			
6.	Varun Dodla (Former Chief Technology Officer of Slynco)	This witness may testify about his work at Slynco as Chief Technology Officer, including his interactions and communications with the defendant. He may also testify about the defendant's actions following the defendant's suspension as Slynco's CEO in July 2022.	Probable		
7.	Andrew Gersh (Partner at KPMG)	This witness may testify about his work at KPMG performing due diligence on Slynco for Goldman Sachs, including his interactions and communications with the defendant.	Probable		
8.	John Giannuzzi (Former Senior Vice President at Goldman Sachs)	This witness may testify about Goldman Sachs leading the Series B fundraising round of Slynco and his role as a member of Slynco's Board of Directors, including his interactions and communications with the defendant in both his professional and personal capacity.	Probable		
9.	Walter Hart (Director at Silicon Valley Bank)	This witness may testify about his work at Silicon Valley Bank, including his review of IP session records and bank records in connection with this case.	Probable		
10.	Brad Harris (Chief Executive Officer of Dallas Jet)	This witness may testify to his personal and business dealings with the defendant, his role in brokering defendant's purchase of a Gulfstream G550 private jet, and his investment into Slynco's purported "Series C" fundraising round.	Possible		

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11.	Timothy Kehoe (Former Chief of Staff and Interim President of Slync)	This witness may testify about his work at Slync as Chief of Staff, including his interactions and communications with the defendant. He may also testify about Slync operations, payroll, and financial accounts.	Probable		
12.	Sarah Israel (Forensic Accountant for FBI)	This witness may testify to her work on this case for the FBI, including tracing the proceeds of investor money and bank proceeds, records obtained and reviewed, and the execution of a search warrant at the defendant's residence.	Probable		
13.	Samar Kamdar (Former Chief Financial Officer of Slync)	This witness may testify about his work at Slync as Chief Financial Officer, including his interactions and communications with the defendant. He may also testify about the circumstances surrounding his termination from Slync in 2022.	Probable		
14.	Raj Patel (Former Chief Product Officer of Slync)	This witness may testify about his work at Slync as Chief Product Officer, including his interactions and communications with the defendant.	Possible		
15.	Dan Peterie (Special Agent for FBI)	This witness may testify to his work on this case for the FBI, including records obtained and interviews conducted.	Possible		
16.	Jason Selvidge (Former Vice President of Engineering of Slync)	This witness may testify about his work at Slync as Vice President of engineering, including his interactions and communications with the defendant. He may also testify about the circumstances surrounding his termination from Slync in 2022.	Possible		

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17.	John Whitworth (Senior Financial Investigator for FBI)	This witness may testify to his work on this case for the FBI, including tracing the proceeds of investor money and bank proceeds.	Possible		
18.	Brian Yee (Partner at ACME)	This witness may testify about ACME's investment into Slync during its Series B fundraising round and his role as an observer on Slync's Board of Directors, including his interactions and communications with the defendant in both his professional and personal capacity.	Probable		

Respectfully submitted,

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